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THURSDAY, OCTOBER 27, 2005  
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## **FORMER REPUBLICAN PARTY FUNDRAISER THOMAS W. NOE** **INDICTED FOR ILLEGAL CAMPAIGN CONTRIBUTIONS**

WASHINGTON, D.C. – A federal grand jury in Toledo, Ohio has indicted Thomas W. Noe, a former Republican party fundraiser, for allegedly making illegal campaign contributions using conduit contributors, Assistant Attorney General Alice S. Fisher of the Criminal Division and U.S. Attorney Gregory A. White of the Northern District of Ohio announced today.

The three-count indictment returned today alleges that beginning in October 2003, Noe made contributions to President George W. Bush's 2004 re-election campaign over and above the limits established by the Federal Election Campaign Act (FECA). He did so, according to the indictment, in order to fulfill his pledge to raise \$50,000 for a Bush-Cheney fundraiser held in Columbus, Ohio on Oct. 30, 2003. The indictment alleges that Noe disguised his contributions by recruiting and providing money to friends and associates who made campaign contributions in their own names. The indictment also alleges that Noe wrote several checks in amounts slightly less than the maximum allowable amount so as to avoid suspicion. Altogether, Noe allegedly contributed \$45,400 of his own money through 24 conduits.

Noe is charged with making contributions in the names of others, in violation of the FECA's anti-conduit provision. The indictment charges that Noe also conspired to make contributions in the names of others, to cause the submission of false statements to the Federal Election Commission, and to defraud the United States. The indictment alleges that Noe caused the conduits to fill out contribution cards and forms falsely certifying that they were making the contributions themselves, and that these false statements caused President Bush's campaign committee to unknowingly submit a false campaign finance report to the FEC. The campaign committee has been fully cooperative with the government's investigation.

If convicted, Noe faces a maximum sentence on each count of five years in prison. The conspiracy and false statement counts carry a maximum fine of \$250,000, and the FECA count carries a mandatory fine of between \$136,200 and \$454,000.

This case is being prosecuted by Assistant U.S. Attorneys Seth D. Uram and David O. Bauer of the U.S. Attorney's Office for the Northern District of Ohio, which is headed by U.S. Attorney Gregory A. White, and Trial Attorney John P. Pearson of the Public Integrity Section, which is headed by Section Chief Noel L. Hillman. The case is being investigated by the Federal Bureau of Investigation.

An indictment is merely an accusation. All defendants are presumed innocent until proven guilty beyond a reasonable doubt at trial.

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